

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

PFLAG, INC., et al.,

*Plaintiffs,*

v.

Civil Action No. BAH-25-337

DONALD J. TRUMP, in his official capacity as President of the United States, et al.,

*Defendants.*

**DECLARATION OF JOSHUA BLOCK IN SUPPORT OF PLAINTIFFS' MOTION TO ENFORCE PRELIMINARY INJUNCTION**

I, Joshua Block, hereby declare and state:

1. I am over 18 years of age, of sound mind, and fully capable of making this declaration. I have personal knowledge of the facts set forth in this declaration, they are true and correct, and I would be able to testify about these facts if I were called as a witness at a hearing or trial.
2. I am a licensed attorney in the State of New York. I am Senior Counsel at the ACLU, and counsel for Plaintiffs in this action.
3. I submit this declaration in support of Plaintiffs' Motion to Enforce the Preliminary Injunction.
4. On March 5, 2025, the Centers for Medicare and Medicaid Services ("CMS"), a sub-agency of Defendant U.S. Department of Health and Human Services ("HHS"), issued a so-called Quality and Safety Special Alert Memo ("QSSAM") with the subject "Protecting Children from Chemical and Surgical Mutilation." Exhibit A is a true and correct copy of that notice.

5. On March 6, 2025, the Health Resources and Services Administration (“HRSA”) and the Substance Abuse and Mental Health Services Administration (“SAMHSA”), both sub-agencies of Defendant HHS and covered by the preliminary injunction, issued notices to their federal funding recipients stating that each agency will also “review its policies, grants, and programs in light of the concerns discussed in the QSSAM and may begin taking steps in the future to appropriately update its policies to protect children from chemical and surgical mutilation” and “may also consider re-scoping, delaying, or potentially cancelling new grants in the future depending on the nature of the work and any future policy change(s).” Exhibits **B** and **C** are true and correct copies of those notices.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 7th day of March, 2025.

*/s/ Joshua Block*  
Joshua Block